

washers. Nearly 81 million American households have washers and roughly 10 million new units are shipped every year. The impact of this new rule would effectively double the price of purchasing a new washer and eliminate consumer choice through a defacto mandate of side-loading washers. Many have argued that the proposed standards for clothes washers could be met with conventional top-loading designs, but the reality is that a side-loading washer design is the only means of achieving these efficiency standards.

The cost increases associated with these pending regulations are extravagant. DOE estimates the cost to average consumers to be: \$240 more for clothes washers, \$274 more for residential central air conditioners, and \$486 more for residential heat pumps. In fact, these products are available now and people do not buy them. Side-loading washers make up less than 12% of the washers sold in the U.S. today.

Also, the new washing machines required by this regulation will require an additional ten minutes in run time per wash. Moreover, these machines will require a special brand of soap manufactured specially for these washers. In addition, fears exist that these appliances will require more expensive servicing.

I am especially concerned that consumers have not been made aware of these mandates, and believe a 60-day comment period was insufficient to receive proper input. The poor, the elderly and those on fixed incomes cannot afford such a drastic change in price for the purpose of cleaning our clothes. The American public is not aware that this misguided regulation is being foisted upon them. We should trust the American people to make their own choices and have control over their own lives.

Accordingly, I am introducing Congressional Review Act (CRA) resolutions to rescind these misguided regulations. The American consumers deserve no less.

#### THE RETIREMENT SECURITY ACT OF 2001

**HON. RICHARD E. NEAL**

OF MASSACHUSETTS

IN THE HOUSE OF REPRESENTATIVES

*Wednesday, April 4, 2001*

Mr. NEAL. Mr. Speaker, today I am introducing along with Messrs. RANGEL, MATSUI, COYNE and ANDREWS, the Retirement Security Act of 2001. This legislation expands and improves pension coverage for low- and moderate-income workers, by providing a direct incentive for these workers to save for their retirement through pension plans offered by their employers or through an Individual Retirement Account (IRA).

There are three provisions in this legislation. First, the savings proposal allows eligible low- and moderate-income taxpayers to receive up to a 50 percent tax credit for contributions to an IRA or to an employer sponsored defined contribution pension plan, like a 401(k) plan. The credit is refundable so that workers who have little hope of saving for retirement right now might be encouraged to do so under this bill. It is this group of workers who are most at risk of retiring without adequate retirement savings, and it is this group which has proven to be the most difficult to bring into the pen-

sion system. They need additional incentives to help get them off the ground, which is why a refundable credit is key to any proposal to expand pension coverage to this group.

The 50 percent refundable credit would be available for single taxpayers with adjusted gross incomes up to \$12,500, and up to \$25,000 for joint returns. The credit amount phases down from fifty percent to zero between \$25,000 and \$75,000 on a joint return. The maximum credit amount would be \$1,000. The credit would be claimed on the federal income tax form. While it might be more appealing to workers if the money was given to them up front, a tax credit provides the most efficient form of delivery.

The next two provisions of the bill provide tax credits to small businesses to expand pension coverage and participation. First, a small business tax credit would be given to small employers of 100 or less employees equal to 50 percent of administrative and retirement education expenses for the first three years of a newly established qualified pension plan.

The second small business credit would be for employer contributions to new qualified pension plans, also for up to three years. Under this provision, small employers could take a 50 percent tax credit for employer contributions made to any pension plan on behalf of any non-highly compensated employees covered under the plan. All of these provisions would generally be effective after December 31, 2001.

Mr. Speaker, this is a summary of the provisions contained in this bill. I believe it directly and firmly addresses the issues of pension coverage, participation, and savings for a group of workers who need this help because they are currently excluded from our pension system. This bill would expand the number of employees covered by plans and would provide a strong incentive for many individuals in a plan to save additional amounts for their retirement. In addition, the bill provides needed incentives for small businesses to offer pension coverage to their employees.

I hope the Committee on Ways and Means will consider this approach carefully as an addition to any pension legislation that the Committee adopts this year.

#### CELEBRATING GREEK INDEPENDENCE

**HON. BOB FILNER**

OF CALIFORNIA

IN THE HOUSE OF REPRESENTATIVES

*Wednesday, April 4, 2001*

Mr. FILNER. Mr. Speaker, I rise to celebrate with my colleagues the 180th anniversary of Greek independence. Greek culture has been a foundation for the world, spreading from the dense forests of India to the shores of the United States. Its contributions pervade the sciences, arts and literature, and political theory and practice.

The most important influence came from the polis (city-state) of Athens. Unlike the city-states of Corinth, whose mastery of trade and commerce gave it prominence, or Sparta, whose discipline and military gave it strength, Athens drew its power from ideas. The leaders of Athens recognized the equality of its citizens; that progress would be made in stressing not the strength, class, or wealth of any individual, but his ability.

Recognizing that ability is a product of each person's character and not an attribute fated in birth, they strove to promote opportunity for each Athenian citizen to live to the best of his abilities. They concluded that in order for its society to be open, free, and just, the optimal type of government was one in which the people could directly participate in their governance. Because of its democracy, Athenian civilization achieved unparalleled influence, not only during its time, but historically as well.

But we are also paying tribute to the re-emergence of Greek independence. After hundreds of years of governance by foreign powers, the people of Greece rose up as gloriously as their mythological heroes to overcome the Ottoman Empire. Greece's triumphant return to independence in 1821 symbolizes that the light of democracy can only be eclipsed, but never extinguished.

Yet we also learn from the Greeks that there can be a negative effect of military, financial, and cultural success: hubris, or arrogant pride. This, as much as anything else we learn from Greek civilization, is crucial for us to understand and learn. Greece, at the height of its power, because of complacency, neglect, and pride became a victim of its own success. And we must learn from this failure as much as from its success. In the spirit of Greek thought and examination, we must ask ourselves: Will we be guilty of inciting our adversaries, of manipulating our neighbors and allies? Will we destroy the rights and life of an individual so the majority will not be bothered by criticism and truth?

The United States owes many of its achievements to what we have learned, or borrowed, from the Greeks. Our two histories are very much intertwined. We now bask in the light of our own Golden Age. But we must realize that what befell the Athenians, the Spartans, and the Corinthians could happen to us. What we do with our Golden Age dictates our future for years to come. The decisions we make, both domestically and internationally, are critical to our future, even at the height of our power. What will be said of us two millennia from now? Will we be judged a success—or a failure?

Today, we celebrate the freedom of those who first gave birth to the very concept. The enduring legacy of Greece lies as much in the triumph of regaining independence as much as in its first establishment. We honor the Greek spirit and celebrate the liberation of a people and culture whose gifts transcend all ages.

#### AMENDMENTS TO THE TAXPAYER RELIEF ACT OF 1997

**HON. E. CLAY SHAW, JR.**

OF FLORIDA

IN THE HOUSE OF REPRESENTATIVES

*Wednesday, April 4, 2001*

Mr. SHAW. Mr. Speaker, today I am introducing a bill that would eliminate a trap for the unwary that was inadvertently created with the Taxpayer Relief Act of 1997. The bill would clarify the treatment for foreign tax credit limitation purposes of the income inclusions that arise upon a transfer of intangible property to a foreign corporation.

Section 367(d) of the Internal Revenue Code provides for income inclusions in the

form of deemed royalties upon the transfer of intangible property by a U.S. person to a foreign corporation. Prior to the 1997 Act, these income inclusions under section 367(d) were deemed to be U.S.-source income and thus were not eligible for foreign tax credits. The international joint venture reforms included in the 1997 Act eliminated this special source rule and provided that deemed royalties under section 367(d) are treated as foreign-source income for foreign tax credit purposes to the same extent as an actual royalty payment.

The amendments made by the 1997 Act were intended to eliminate the penalty that was provided by the prior-law deemed U.S. source rule and that had operated to discourage taxpayers from transferring intangible property in a transaction that would be covered by section 367(d). Prior to the 1997 Act, in order to avoid this penalty, taxpayers licensed intangible property to foreign corporations instead of transferring such property in a transaction that would be subject to section 367(d). The 1997 Act's elimination of the penalty source rule of section 367(d) was intended to allow taxpayers to transfer intangible property to a foreign corporation in a transaction that gives rise to deemed royalty payments under section 367(d) instead of having to structure the transaction with the foreign corporation as a license in exchange for actual royalty payments.

However, the intended goal of the 1997 Act provision is achieved only if the deemed royalty payments under section 367(d) not only are sourced for foreign tax credit purposes in the same manner as actual royalty payments, but also are characterized for foreign tax credit limitation purposes in the same manner as actual royalty payments. Without a clarification that deemed royalty payments are characterized for foreign tax credit limitation purposes in the same manner as an actual royalty payment, there is a risk in many cases that such deemed royalties would be characterized in a manner that leads to a foreign tax credit result that is equally as disadvantageous as the result that arose under the penalty source rule that was intended to be eliminated by the 1997 Act.

The bill I am introducing today provides the needed clarification that deemed royalties under section 367(d) are treated for foreign tax credit limitation purposes in the same manner as an actual royalty, ensuring that the penalty that was intended to be eliminated with the 1997 Act is in fact eliminated. Without this clarification, a taxpayer that transfers intangible property in reliance on the 1997 Act will find that its transfer is in fact effectively subject to the penalty that the taxpayer believed had been eliminated. Without the clarification, those taxpayers that have structured their transactions in reliance on the 1997 Act provision will be worse off than they would have been if the purported repeal of the penalty source rule had never occurred and they had continued to structure their transactions to avoid that penalty. This bill will achieve the intended goals of the 1997 Act and prevent a terrible trap for the unwary that has been inadvertently created.

## COMMENDING THE GOVERNMENT OF BULGARIA

### HON. HENRY BONILLA

OF TEXAS

IN THE HOUSE OF REPRESENTATIVES

Wednesday, April 4, 2001

Mr. BONILLA. Mr. Speaker, I commend the leadership of the government of Bulgaria for its ongoing interest in and support for modernization of the Maritza III East thermal plant. I urge the sitting Parliament in Sofia to express their support for this project by granting, all necessary government approvals before their scheduled dismissal prior to the upcoming, general elections. This will ensure that this important project can move forward expeditiously and successfully.

The Maritza III East thermal plant project has benefits that are well documented and widely-acknowledged at the local, regional and national levels. When the refurbishment work begins, more than \$75 million in local goods and services will be purchased and more than 600 construction jobs will be created.

Regionally, refurbishment of the Maritza III East power plant will reduce sulphur dioxide emissions by as much as 90 to 95 percent. The refurbished power plant will meet the emissions requirements of the World Bank, European Union, the Bulgarian government, which in turn, will fulfill important criteria for Bulgaria's ultimate entry into the European Union. Also at the regional level, the joint venture (Enterger & NEK) company that will operate the rehabilitated power plant will provide direct and indirect tax revenues to Bulgaria and to the Galabovo municipality in the Stara Zagora region.

On a broader scale, modernization of this power plant will have several positive impacts on Bulgaria's national economy. Long-term, modernization of this power plant will move Bulgaria closer to competitive energy independence.

## INTRODUCTION OF THE EXPENSING TECHNOLOGY REFORM ACT OF 2001

### HON. JERRY WELLER

OF ILLINOIS

IN THE HOUSE OF REPRESENTATIVES

Wednesday, April 4, 2001

Mr. WELLER. Mr. Speaker, today, Representative NEAL and I have introduced legislation which will update the existing depreciation schedules for high tech assets. Currently, businesses must depreciate much of their high tech equipment over a 5 year period. This bill would allow businesses to expense these assets.

The 5 year depreciation lifetime for tax purposes is outdated since many companies today must update their computers as quickly as every 14 months in order to stay technologically current. We allow businesses to expense their computers, peripheral equipment, servers, networks, wireless telecommunications equipment, software, high tech medical equipment and copiers in this bill.

This will stimulate the economy! According to a study conducted by the Printing Industries of America, printers would purchase 20 percent more computers if the depreciation

schedules reflected the actual life of the equipment.

It is time to update an outdated tax code to reflect the realities of today's technology-based workplace. A 5 year depreciation schedule for high tech equipment is no longer realistic.

This legislation will allow every company, from the neighborhood real estate office, to the local hospital, to the local bank to fully depreciate, or expense, their high tech equipment during the tax year in which the equipment is purchased. As a result, these companies will no longer be forced to keep their equipment "on the books" for tax purposes long after its useful life has become obsolete.

Mr. Speaker, I look forward to working with you and my colleagues to get this important pro-business legislation signed into law.

## PERSONAL EXPLANATION

### HON. GREG WALDEN

OF OREGON

IN THE HOUSE OF REPRESENTATIVES

Wednesday, April 4, 2001

Mr. WALDEN of Oregon. Mr. Speaker, due to my presence at a funeral in Oregon on Tuesday, April 3, I was not able to participate in any roll call votes that took place on that day. If I had been present, I would have voted "yea" on roll call votes #76, #77 and #78.

## HONORING THE 50TH ANNIVERSARY OF WMUK RADIO

### HON. FRED UPTON

OF MICHIGAN

IN THE HOUSE OF REPRESENTATIVES

Wednesday, April 4, 2001

Mr. UPTON. Mr. Speaker, I rise today to honor the 50th Anniversary of one of the finest radio stations in my state of Michigan, and indeed the entire Midwest, WMUK, of Kalamazoo, Michigan.

Like many of our country's greatest institutions, WMUK had modest beginnings. In 1951, based on the campus of what was then Western Michigan College, WMUK was founded under the call letters WMCR. WMCR was only on the air for a few hours each day and early programming consisted of music and instructional programs. At the time, WMCR was a pioneer in radio. As such, it was the first FM station in Kalamazoo.

Over the years, WMCR's development mirrored the growth of Kalamazoo. For example, in 1961, WMCR changed their call letters to WMUK to reflect Western Michigan College's name change to Western Michigan University. A few years later, in 1965 WMUK was the first radio station in Kalamazoo to begin broadcasting in stereo. Over the years, as the station's popularity has grown so has their signal strength. From a meager 400 watts in 1951, today, WMUK broadcasts at 50,000 watts.

Today, after 50 years, WMUK is a cornerstone of the Kalamazoo community. I am pleased to say that WMUK is now on the air 21 hours a day offering a wide variety of programming to suit the diverse tastes of our community.

Mr. Speaker, I ask that these remarks be made part of the permanent record of the